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IN THE DISTRICT COURT OF
Payne, County, Oklahoma
FILED

IN THE DISTRICT COURT OF PAYNE COUNTY
STATE OF OKLAHOMA

DEC 12 2012

LISA S. LAMBERT Court Clerk
By _____ Deputy

BRYAN GRANT, an individual,)
vs.)
Plaintiff,)
SHELTER MUTUAL INSURANCE)
COMPANY, a Foreign Insurance Company)
Doing Business in Oklahoma,)
Defendant.)

No. CJ- 2012-603
Attorneys Lien Claimed
Jury Trial Demanded

PETITION

COMES NOW the Plaintiff, Bryan Grant, and for his cause of action against the Defendant alleges and states as follows:

1. Plaintiff is a resident of Payne County, State of Oklahoma.
2. Defendant is a foreign insurance company, doing business in Payne County.
3. Venue is proper pursuant to 12 O.S. §137.
4. That on or about May 28, 2012, the Plaintiff was the owner of a 2008 Suzuki XL-7 automobile; that on or about May 28, 2012 the vehicle was destroyed as a result of an automobile collision; that at all times relevant hereto, the Plaintiff was insured by the Defendant through a policy of insurance that made the Defendant responsible for providing coverage for the total loss of the vehicle in question.
5. That the Defendant has failed to pay its insured a fair amount under the contract of insurance issued by the Defendant to its insured, Bryan Grant; therefore Defendant has breached the contract with Plaintiff.



6. That Defendant has in this case and does systematically and knowingly undervalue total loss auto claims by utilizing a method which is inherently unfair, biased, flawed and formulated for the specific purpose of reducing claim indemnity payments.
7. That the Defendant has acted in bad faith toward the Plaintiff as it relates to this property damage claim; the Defendants actions were done with a conscious disregard of the rights of the Plaintiff and the Defendant is therefore responsible to the Plaintiff for both actual and punitive damages.

WHEREFORE, premises considered, Plaintiff prays that judgment be granted against the Defendant in an amount in excess of \$75,000.00 for its acts of bad faith, for both actual and punitive damages, for court costs incurred herein, for attorney fees, and for such other further relief deemed just and proper by this Court.

Respectfully Submitted,



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